

**UNITED STATES DISTRICT COURT**

**MIDDLE DISTRICT OF PENNSYLVANIA**

**MARYANN BUTLER and AUDURY PETIE DAVIS,**

Plaintiffs,

v.

**NEW AMERICAN FUNDING et al.,**

Defendants.

Civil Action No. 1:25-cv-00690

**FILED**  
HARRISBURG, PA

JUL 22 2025

PER

DEPUTY CLERK

**JUDICIAL NOTICE OF CURATIVE AMENDMENT AND RECORD  
CLARIFICATION**

Plaintiffs, by and through pro se representation, hereby submit this Judicial Notice to clarify and perfect the record following recent filings, and to ensure all parties and the Court recognize the curative and supplemental scope of the pleadings submitted on July 21–22, 2025.

1. On July 21, 2025, Plaintiffs filed a Verified Supplemental Complaint naming the following individuals in their personal capacities:
  - Amy Dale (Senior Executive, New American Funding)
  - Sean Wainwright (Loan Officer)
  - Enrico Arvielo (Founder/Executive, signatory of PA registration)
2. This supplemental complaint was filed in response to:
  - Misconduct during an FHA refinance process,
  - Document concealment and misuse of borrower data,
  - Off-portal loan handling (Exhibit O),
  - False statements to the CFPB (Exhibit E),

- Voicemail evidence on USB (Exhibits F & F2),
  - Appraisal misdirection (Exhibit Y),
  - Bounce-back communications (Exhibits D & D2),
  - And unlicensed operation (Exhibits 4 and 5).
3. The Verified Supplemental Complaint is intended to be part of the operative record alongside the Verified Curative Complaint already filed on July 14, 2025. The inclusion of Amy Dale, Sean Wainwright, and Enrico Arvielo was properly captioned and verified.
  4. Plaintiffs respectfully notify the Court that this clarification is made in good faith and is not an attempt to amend by motion, but rather to preserve judicial clarity as the docket progresses toward Third Circuit review.

WHEREFORE, Plaintiffs respectfully request that this Notice be docketed to preserve a clear record of the named parties and supporting evidence.

Respectfully submitted,

/s/ Audury Petie Davis

Audury Petie Davis

2041 Greenwood Street

Harrisburg, PA 17104

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(717) 424-8220

Dated: July 22, 2025

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### **Verification**

I, Audury Petie Davis, hereby verify under penalty of perjury pursuant to 28 U.S.C. § 1746 that the foregoing Judicial Notice and all factual assertions therein are true and correct to the best of my knowledge and belief.

Executed on this 22nd day of July, 2025.

Respectfully,

/s/ Audury Petie Davis

Audury Petie Davis

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### **Certificate of Service**

I, Audury Petie Davis, certify that on this 22nd day of July, 2025, I served a true and correct copy of the foregoing:

- Judicial Notice of Curative Amendment and Record Clarification
- Verified Supplemental Complaint (filed separately)
- Verification and Certificate of Service

via U.S. Mail to:

James N. McNally

Cohen Seglias Pallas Greenhall & Furman PC

Jmcnally@cohenseglias.com

Respectfully submitted,

/s/ Audury Petie Davis

Audury Petie Davis